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Northwest Sports Fishing Industry Comments on DNS 13-064 Cathlamet Net Pens

From: NSIALIZ@aol.com
Sent: Wednesday, September 04, 2013 2:02 PM
To: SEPADesk2 (DFW)
Subject: Re: Cathlamet Channel Salmon Rearing Net Pens

September 4, 2013

To Whom It May Concern:

On behalf of the Northwest Sportfishing Industry Association, thank you for the opportunity to comment on proposal #DNS 13-064 Cathlamet Channel Nert Pens - Wahkiakum Co.

Overall, NSIA is highly supportive of conducting commercial fisheries focused on hatchery fish in off channel areas which are out of the migration corridor of the mainstem Columbia River and relatively free of wild and listed stocks.

These off channel acclimation areas provide for vibrant sport and commercial fisheries with very limited impacts on the ESA listed stocks. Using off channel acclimation for commercial fisheries allows for maximum economic benefit from excess hatchery fish, while focusing the enormous economics of the sport fishing industry in the mainstem.

We understand that the Cathlamet Channel currently has at least eight active drift rights. This would inform us that the channel is an active migration corridor utilized by enough migrating Columbia River salmon to support an industrial endeavor, and suggesting that it may not fit the description of a true SAFE zone. A true SAFE Zone is usually a terminal, off channel area

with a unique water source, which the Cathlamet Channel lacks. This could interfere with net pen fish homing to this area.

If the Cathlamet Channel is chosen as a SAFE area, several key components of the exiting joint state management agreement could be jeopardized:

1. By 2017, 20 percent of the ESA impacts will be the set aside to provide SAFE fisheries. An area that currently serves a commercial purpose would appear to have a high likelihood of eating into the mainstem sport allocation.
2. During the Spring Chinook Fishery, existing SAFE areas have been known to utilize 15 percent impacts. This makes it necessary for new SAFE areas to have minimal interactions with upriver stocks, especially with production releases expected to increase significantly at existing SAFE sites. The Cathlamet Channel has the potential to use all the impacts and jeopardize the existing SAFE fisheries.
3. We understand that small mesh gill nets are being contemplated to reduce up-river impacts. We are concerned that this gear may not be appropriate to ensure that the total of all SAFE areas will stay under 20 percent. Additionally this channel is the site of a robust recreational steelhead fishery, and small mesh gillnets are highly lethal to steelhead. Current mainstem gillnet fisheries do not switch to small mesh until the steelhead have migrated through. Using small mesh gillnets could be problematic for the fragile winter steelhead that are in the river during the spring and for other steelhead stocks if the site were to be used for species other than spring Chinook.

In closing, we fully support using SAFE areas to access hatchery fish in a manner that targets the commercial fishery off of the wild fish and gives mainstem priority to recreational fisheries. Oftentimes “experiments,” whether they succeed or not, become the status quo. Some would argue that the use of tangle nets in the mainstem is an example of an experiment that did not work. Since tested they have been rarely used due to the presence of listed steelhead during the early part of the spring migration and the presence of shad in the later part of the migration. They might well test out in this site, but the public needs to have the confidence that a failed test will not become the status quo. If the Cathlamet Channel site (or other Washington sites) can protect wild steelhead, the mainstem sport fishery, and the existing SAFE areas, we are in full support. We trust The Department will be monitoring for these criteria at this and other sites.

In Service,

Liz Hamilton, Executive Director
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For the Love of Fish!